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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case:2:19-cr-20310  
Judge: Cox, Sean F.  
MJ: Majzoub, Mona K.  
Filed: 05-16-2019 At 03:55 PM  
SEALED MATTER (af)

Violations: 18 U.S.C. § 922(g)(1)  
18 U.S.C. § 924(c)  
18 U.S.C. § 924(o)  
18 U.S.C. § 1114

D-1 KEVIN KESHAWN YOUNG,  
a/k/a "Gucci,"  
a/k/a "Kevin Kelvin,"  
D-2 AARON MARQUIS SHOOKS,  
a/k/a "Boogey,"  
D-3 JOSEPH ALEXANDER ELLINGTON,  
a/k/a "Sleaz,"  
a/k/a "Joe Sleaz,"

Defendants.

**INDICTMENT**

THE GRAND JURY CHARGES:

**GENERAL ALLEGATIONS**

1. At all times material to this indictment, OES 187 Head Hunters (hereinafter referred to as "OES"), was a Criminal street gang, which existed geographically and territorially alongside, and in some instances, in a hostile co-existence with other street gangs within the City of Detroit, Michigan.

2. At all times material to this indictment, OES operated on the East Side of Detroit.

3. At all times material to this indictment, the letters OES stood for “Out Eliminating Suckers/Suckas.” “187” refers to California Penal Code Section 187(a), which defines the crime of murder.

4. At all times material to this indictment, OES was in a feud or “beef,” that is: a state of periodic armed conflict, with one or more rival criminal street gangs operating on the East Side of Detroit. “Block Squad” was one of those rival criminal street gangs.

5. At all times material to this indictment, the defendants, KEVIN KESHAWN YOUNG, AARON MARQUISA <sup>AME</sup> SHOOKS, JOSEPH ALEXANDER ELLINGTON, and other individuals known and unknown to the Grand Jury were members or associates of OES.

6. At various times material to this indictment, members of OES, including the defendants, utilized social media such as Facebook, to communicate with others within OES, and to the outside world. At various times, members of OES, including defendants KEVIN KESHAWN YOUNG, AARON MARQUISA <sup>AME</sup> SHOOKS, JOSEPH ALEXANDER ELLINGTON, and others, displayed on Facebook, photographic images of themselves: (1) in possession of firearms; (2) in possession

of large amounts of currency; (3) making gang hand signs; and (4) showing affiliation to and promotion of OES.

7. At various times material to this indictment, including the period of 2015 to the date of this indictment, members of OES, including the defendants, engaged in armed conflict with rival gangs. Such conflict featured the discharge of firearms, and exchange of gunfire (commonly referred to as “shootouts”) on the streets of Detroit. The shootouts were often conducted from moving vehicles in residential neighborhoods.

8. At various times material to this indictment, members of OES, including the defendants, maintained firearms at various locations.

9. At various times material to this indictment, members of OES, including the defendants, concealed and disposed of firearms in order to hinder or avoid seizure and apprehension by law enforcement.

10. On March 25, 2019, AARON SHOOKS and another individual (“Person 1”) purchased a firearm, that is: a Walther, Model PK380, caliber .380 pistol, SN: WB121065, pink and black in color, from Action Impact in Eastpointe, Michigan.

11. On April 15, 2019, between approximately 1:30 p.m. and 2:00 p.m., defendant AARON MARQUIS SHOOKS, and two other individuals known to the Grand Jury, were involved in a physical altercation with a rival gang member at a FedEx office on Moross Street in Detroit, Michigan.

12. On April 15, 2019, between approximately 1:30 p.m. and 2:00 p.m., defendant AARON MARQUIS SHOOKS, Person 1, and two other individuals known to the Grand Jury, were involved in a shootout outside the FedEx office with rival gang members (“Shooting No. 1”), while driving a motor vehicle (Car A). This is the same vehicle that SHOOKS was driving when he and Person 1 purchased the pink and black firearm referenced above. As a result of that exchange of gunfire, Person 1 suffered a minor wound to her head.

13. On April 15, 2019, two (2) Special Agents of the Bureau of Alcohol, Tobacco, Firearms and Explosives, were conducting surveillance and other investigative activities – in an unmarked motor vehicle – as part of an unrelated federal criminal investigation, on the East Side of Detroit, Michigan.

14. On April 15, 2019, between approximately 1:45 p.m. and 2:00 p.m., JOSEPH ALEXANDER ELLINGTON, at a residence on Rossiter Street, in Detroit, Michigan, was in receipt of, and obtained possession of a Walther, Model PK380, caliber .380 pistol, SN: WB074175, black in color.

15. On April 15, 2019, between approximately 1:45 p.m. and 2:00 p.m., defendant KEVIN KESHAWN YOUNG, in the company of and in the same vehicle (Car A) with, AARON MARQUIS SHOOKS, Person 1, JOSEPH ALEXANDER ELLINGTON and two other individuals known to the Grand Jury, fired approximately eleven (11) rounds from a semi-automatic 9mm handgun, of

unknown make, at the two (2) Special Agents of the Special Agents of the Bureau of Alcohol, Tobacco, Firearms and Explosives, referenced in paragraph 11 (“Shooting No. 2”).

16. During both Shooting No. 1 and Shooting No. 2, Person 1 was carrying a firearm, specifically, a Walther, Model PK380, caliber .380 pistol, SN: WB121065, pink and black in color. Said firearm was discharged during Shooting No. 1, and remained in her possession and loaded during Shooting No. 2.

### **COUNT ONE**

D-1 KEVIN KESHAWN YOUNG

D-2 AARON MARQUIS SHOOKS

(18 U.S.C. §§1114 and 2 – ATTEMPTED MURDER OF A FEDERAL OFFICER, AIDING AND ABETTING)

1. The allegations contained in the General Allegations are incorporated herein.
2. On or about April 15, 2019, in Detroit, Michigan, in the Eastern District of Michigan, the defendants, KEVIN KESHAWN YOUNG and AARON MARQUIS SHOOKS, aided and abetted by each other, did unlawfully attempt to kill two (2) Officers and Employees of the United States, to wit: Special Agents of the Bureau of Alcohol, Tobacco, Firearms and Explosives, while engaged in the performance of their official duties, in violation of Title 18, United States Code, Sections 1114 and 2.

**COUNT TWO**

D-1 KEVIN KESHAWN YOUNG

D-2 AARON MARQUIS SHOOKS

(18 U.S.C. §924(o) – CONSPIRACY TO USE AND CARRY FIREARMS DURING, AND IN  
RELATION TO, A CRIME OF VIOLENCE)

1. The allegations contained in the General Allegations are incorporated herein.
2. From a date unknown, the exact date being unknown to the Grand Jury, and continuing through the date of this Indictment, in Detroit, Michigan, in the Eastern District of Michigan, the defendants, KEVIN KESHAWN YOUNG, AARON MARQUIS SHOOKS, and others both known and unknown to the Grand Jury, did unlawfully, willfully, and knowingly combine, conspire, confederate, and agree among themselves and others to commit an offense, that is: Use and Carry of a Firearm During and In Relation to a Crime of Violence, in violation of Title 18, United States Code, Section 924(c)(1)(A)(iii) (as more particularly described in Count Three of this Indictment).

All in violation of Title 18, United States Code, Section 924(o).

**COUNT THREE**

D-1 KEVIN KESHAWN YOUNG

D-2 AARON MARQUIS SHOOKS

(18 U.S.C. §§924(c) and 2 – USE AND CARRY OF A FIREARM DURING, AND IN  
RELATION TO, A CRIME OF VIOLENCE)

1. The allegations contained in the General Allegations are incorporated herein.

2. The allegations contained in Count Two are realleged and incorporated herein.

3. On or about April 15, 2019, in Detroit, Michigan, in the Eastern District of Michigan, the defendants, KEVIN KESHAWN YOUNG and AARON MARQUIS SHOOKS, aided and abetted by each other, did (1) knowingly discharge, carry and use a firearm, that is, a 9mm pistol, of an unknown make; and (2) knowingly carry and use a firearm, specifically, a Walther, Model PK380, caliber .380 pistol, SN: WB121065, pink and black in color, during and in relation to a crime of violence for which the defendants may be prosecuted in a court of the United States, that is: Attempted Murder of a Federal Officer (as more particularly described in Count One of this Indictment); in violation of Title 18, United States Code, Sections 924(c)(1)(A)(iii) and 2; and *Pinkerton v. United States*, 328 U.S. 640, 647-48 (1946).

#### **COUNT FOUR**

D-1 KEVIN KESHAWN YOUNG

(18 U.S.C. §922(g)(1) – FELON IN POSSESSION OF A FIREARM)

On or about April 15, 2019, in Detroit, Michigan, in the Eastern District of Michigan, the defendant, KEVIN KESHAWN YOUNG, possessed: (1) a firearm that had been shipped and transported in interstate and foreign commerce, that is, a 9 mm pistol, of an unknown make; and (2) ammunition that had been shipped and transported in interstate and foreign commerce, that is, 9mm ammunition produced

by Hornady Manufacturing, after having been convicted of a crime punishable by imprisonment for a term exceeding one year, and did so knowingly, all in violation of Title 18 United States Code, Section 922(g)(1).

**COUNT FIVE**

*2nd*  
D-3 JOSEPH ALEXANDER ELLINGTON

(18 U.S.C. §922(g)(1) – FELON IN POSSESSION OF A FIREARM)

On or about April 15, 2019, in Detroit, Michigan, in the Eastern District of Michigan, the defendant, JOSEPH ALEXANDER ELLINGTON, possessed: (1) a firearm that had been shipped and transported in interstate and foreign commerce, that is, a Walther, Model PK380, caliber .380 pistol, SN: WB074175, black in color; and (2) assorted ammunition that had been shipped and transported in interstate and foreign commerce, after having been convicted of a crime punishable by imprisonment for a term exceeding one year, and did so knowingly, all in violation of Title 18 United States Code, Section 922(g)(1).

**FORFEITURE ALLEGATION**

The allegations contained in Counts One through and Five of this Indictment are hereby incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 924(d), together with Title 28, United States Code, Section 2461(c).

Upon conviction of one or all of the offenses alleged in Counts One through



Five of this Indictment, Defendants KEVIN KESHAWN YOUNG and AARON MARQUIS SHOOKS, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearm(s) involved in or used in the knowing commission of the offense(s).

THIS IS A TRUE BILL.

s/ Grand Jury Foreperson  
Grand Jury Foreperson

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Dated: May 16, 2019

United States District Court  
Eastern District of Michigan**Criminal Case Cover**Case: 2:19-cr-20310  
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <i>gmk</i>

Case Title: USA v. Kevin Keshawn Young et al.County where offense occurred : WayneCheck One: ☒ Felony ☐ Misdemeanor ☐ Petty

☐ Indictment/ ☐ Information --- no prior complaint.  
☒ Indictment/ ☐ Information --- based upon prior complaint [Case number: 19-mj-30230]  
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

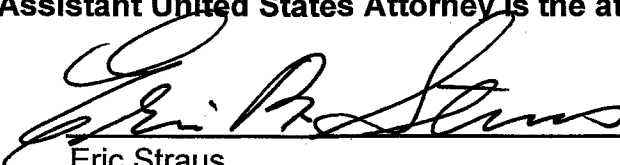
- ☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

May 16, 2019

Date

  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.